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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN COLLINS,

Defendant.

CR No. 16-

CR16-0157

I N F O R M A T I O N

[18 U.S.C. § 1030(a)(2)(C),
(c)(2)(B)(ii), (iii): Unauthorized
Access to a Protected Computer to
Obtain Information]

The United States Attorney charges:

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(ii), (iii)]

1. Apple, Inc. ("Apple"), located in Cupertino, California, operates computers used by subscribers all over the world in interstate and foreign commerce and communications. One of the services that Apple provides to its customers is "iCloud," a "cloud" computing back-up system for subscriber data. Photographs and videos taken on Apple iPhones and other digital devices can be automatically backed up to the iCloud, making them accessible to users on the Internet.

2. Google, Inc. ("Google"), located in Mountain View, California, operates computers used by subscribers all over the world in interstate and foreign commerce and communications. One of the



1 services that Google provides to its customers is Gmail, an e-mail
2 service.

3 3. Between on or about November 1, 2012, and September 2,
4 2014, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendant RYAN COLLINS, knowingly,
6 intentionally, and in furtherance of criminal and tortious acts,
7 namely, Grand Theft, in violation of California Penal Code Section
8 487, and the California State torts of Invasion of Privacy and
9 Intrusion upon Seclusion, accessed without authorization and in
10 excess of authorization Apple iCloud and Gmail accounts, which were
11 maintained on protected computers as that term is defined in Title
12 18, United States Code, Section 1030(e)(2)(B), belonging to more than
13 100 victims, including female celebrities residing within the Central
14 District of California, and thereby obtained complete iCloud backups,

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1 photographs, and other private information, the value of which
2 exceeded \$5,000.

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5 United States Attorney

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